

# **Orion Corporation**

## **Code of Conduct**

### **1. Ethical Principles**

Orion Corporation is committed to conducting its business with integrity, transparency, and accountability. All employees, officers, and directors are expected to uphold these principles.

### **2. Conflicts of Interest**

A conflict of interest arises when personal, financial, or professional interests could reasonably be perceived to influence decision-making. Such conflicts must be disclosed promptly and updated as circumstances change.

Failure to disclose does not imply absence of conflict.

### **3. Accountability and Responsibility**

Leaders are responsible for ensuring decisions are documented, communicated, and executed in accordance with governance expectations.

### **4. Reporting and Non-Retaliation**

Employees are encouraged to report ethical concerns without fear of retaliation. Reports may be escalated to governance or risk leadership as appropriate.